

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ENCOMPASS INSURANCE COMPANY  
OF MASSACHUSETTS,

Plaintiff,

v.

JOSEPH D. GIAMPA, FREDERICK T.  
GIAMPA, ADVANCED SPINE  
CENTERS, INC. d/b/a FIRST SPINE &  
REHAB, FUTURE MANAGEMENT  
CORPORATION, EDWARD KENNEDY  
BRIAN J. CULLINEY and JENNIFER  
McCONNELL,

Defendants.

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Civil Action No.: 05-11693-CL

**MOTION FOR ADMISSION *PRO HAC VICE* OF RICHARD E. COE**

Pursuant to Local Rule 83.5.3, the undersigned counsel for Plaintiff and Defendant in Counterclaim, Encompass Insurance Company of Massachusetts (“Encompass”), hereby moves that Richard E. Coe of Drinker, Biddle & Reath LLP, One Logan Square, Eighteenth and Cherry Streets, Philadelphia, PA 19103-6996, be admitted to appear on behalf of Encompass, and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully submits the following:

1. Mr. Coe was admitted to the bar of the State of Massachusetts in 2004 and is a member in good standing;
2. Mr. Coe was admitted to the bar of the State of Pennsylvania in 2005 and is a member in good standing;

3. Mr. Coe was admitted to the bar of the state of New Jersey in 2005 and is a member in good standing.

4. Mr. Coe is and has been a member in good standing of the bars of the following United States District Court since the following date:

United States District Court for the Eastern      2005  
District of Pennsylvania

5. There are no disciplinary proceedings pending against Mr. Coe as a member of the bar in any jurisdiction;

6. Mr. Coe has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and

7. In further support of this motion, Mr. Coe has submitted herewith an affidavit with his Certificate of Good Standing attached as required by Local Rule 83.5.3.

WHEREFORE, the undersigned counsel respectfully requests that this Court admit Mr. Coe to practice before this Court *pro hac vice*.

Respectfully submitted,  
ENCOMPASS INSURANCE COMPANY OF  
MASSACHUSETTS,  
By its Attorney(s),

/s/ Jonathan R. Hausner

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Jonathan R. Hausner (BBO # 654494)  
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June 25, 2008

**CERTIFICATE OF SERVICE**

I, Jonathan Hausner, hereby certify that on this 25 day of June, 2008, this **Motion for Admission Pro Hac Vice of Richard E. Coe**, was filed through the CM/ECF and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing. Paper copies will be sent to those indicated as non registered within twenty-four (24) hours of this filing.

/s/ Jonathan R. Hausner  
Jonathan R. Hausner

Dated: June 25, 2008

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McCONNELL, )

Defendants. )  
\_\_\_\_\_)

**AFFIDAVIT OF RICHARD E. COE**  
**IN SUPPORT OF MOTION FOR ADMISSION *PRO HAC VICE***

Pursuant to Local Rule 83.5.3(b) of Massachusetts Local Rules of Civil Procedure, I, Richard E. Coe of Drinker, Biddle & Reath LLP, One Logan Square, Eighteenth and Cherry Streets, Philadelphia, PA 19103-6996, submit this affidavit in support of Plaintiff and Defendant in Counterclaim, Encompass Insurance Company of Massachusetts' Motion for my admission *pro hac vice* in the above-captioned matter, and hereby state the following:

3. I am admitted to and am a member in good standing of the Bars of the Commonwealth of Massachusetts (2004), the State of Pennsylvania (2005), and the State of New Jersey (2005).

4. I am also admitted to practice and am in good standing before the following courts:

a. United States District Court for the Eastern District of Pennsylvania (2005)

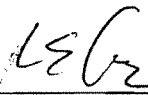
5. I have not been denied admission or been disciplined by any other Court nor have I ever resigned from the practice of law.

6. To my knowledge, I have no grievances pending against me in any jurisdiction.

7. I have fully reviewed and am familiar with the Rules of the United States District Court for the District of Massachusetts.

8. I familiar with the facts and circumstances of this case.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 24th DAY OF JUNE, 2008.

By:   
Richard E. Coe (PA Bar No. 94539)

**ATTACHMENT 1**

**CERTIFICATE OF GOOD STANDING**

UNITED STATES OF AMERICA

EASTERN DISTRICT OF PENNSYLVANIA }

I, Michael E. Kunz, Clerk of the United States District Court for the Eastern District of Pennsylvania,

DO HEREBY CERTIFY That Richard E. Coe , Bar # 94539, was duly admitted to practice in said Court on April 25, 2005, and is in good standing as a member of the bar of said Court.

DATED at Philadelphia, Pennsylvania

MICHAEL E. KUNZ

Clerk of Court

on June 20, 2008 .

BY

Aida Ayala,

Aida Ayala  
Deputy Clerk